

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

- v. -

FLORIM GJONBALAJ,  
a/k/a "Chulo"

Defendant.

- - - - - X

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SEALED INDICTMENT

07 Cr.

10/8

COUNT ONE

The United States Attorney charges:

1. From at least in or about October 2004, through in or about November 2005, in the Southern District of New York and elsewhere, FLORIM GJONBALAJ, a/k/a "Chulo," the defendant, and others known and unknown, unlawfully, willfully, knowingly, and with intent to defraud, did combine, conspire, confederate and agree together and with each other to commit offenses under Title 18, United States Code, Section 1029(a)(2), and did engage in conduct in furtherance of such offenses, which would and did affect interstate commerce.

2. It was a part and an object of the conspiracy that FLORIM GJONBALAJ, a/k/a "Chulo," the defendant, and his co-conspirators, unlawfully, willfully and knowingly, and with intent to defraud, would and did traffic in and use one and more unauthorized access devices during a one-year period, and by such conduct did obtain things of value aggregating \$1,000 and more

during that period, in violation of Title 18, United States Code, Section 1029(a)(2).

Overt Acts

3. In furtherance of said conspiracy and to effect the illegal objects thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about March 3, 2005, GJONBALAJ and a co-conspirator not named herein charged \$4870 at a jewelry store in Manhattan, using a credit card account number attributed to another person, who did not authorize such use of the credit card.

b. On or about October 1, 2005, GJONBALAJ charged \$2,831.39 at a Circuit City in Yonkers, New York, using a credit card account number attributed to another person, who did not authorize such use of the credit card.

(Title 18, United States Code, Section 1029(b)(2).)

  
FOREPERSON

  
MICHAEL J. GARCIA  
United States Attorney